

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

AMERITAS LIFE INSURANCE CORP.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No.: 23-236 (GBW)
	:	
WILMINGTON SAVINGS FUND SOCIETY, FSB, SOLELY AS SECURITIES INTERMEDIARY,	:	
	:	
Defendant.	:	
	:	

**JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF  
REMAINING DISPOSITIVE MOTION BRIEFING DEADLINES**

WHEREAS, Plaintiff filed dispositive motions on February 28, 2025 (D.I. 213, D.I. 218).

WHEREAS, on March 21, 2025, the parties (at Defendant's request) stipulated to extend Defendant's deadline to oppose these dispositive motions by two weeks. D.I. 226. Plaintiff did not seek an extension, but sought only to have its reply deadline reset.

WHEREAS, on March 24, 2025, the Court entered an order granting the parties' stipulation (D.I. 226), setting Defendant's deadline to file its opposition papers on April 14, 2025, and re-setting Plaintiff's deadline to file reply papers on May 5, 2025.

WHEREAS, Plaintiff now seeks, and Defendant has agreed to, a one-week extension of Plaintiff's deadline to file its reply papers in support of its dispositive motions (D.I. 213, D.I. 218)—*i.e.*, that Plaintiff's reply papers would now be due on May 12, 2025.

WHEREAS, Good cause exists for granting the requested extension, including because this would be Plaintiff's first extension of any dispositive motion deadline, the requested extension is short (one week), the requested extension is proportionate given the prior two-week extension for Defendant's opposition papers, the extension requested herein is not being sought for purposes of delay or any other improper purpose, and no party will be prejudiced by the requested extension.

NOW THEREFORE, it is hereby stipulated and agreed by the Parties hereto, subject to Court approval, that Plaintiff's deadline to submit reply papers in support of its dispositive motions (D.I. 213, D.I. 218) shall be extended by one week to May 12, 2025.

**AGREED TO BY AND BETWEEN:**

**COZEN O'CONNOR**

/s/ Kaan Ekiner

Kaan Ekiner (No. 5607)  
1201 North Market St., Ste. 1001  
Wilmington, DE 19801  
302-295-2046  
302-250-4356  
[kekiner@cozen.com](mailto:kekiner@cozen.com)

**K&L GATES LLP**

/s/ Matthew B. Goeller

Steven L. Caponi (No. 3484)  
Matthew B. Goeller (No. 6283)  
600 N. King Street, Suite 901  
Wilmington, DE 19801  
(302) 416-7000  
[steven.caponi@klgates.com](mailto:steven.caponi@klgates.com)  
[matthew.goeller@klgates.com](mailto:matthew.goeller@klgates.com)

-and-

Joseph M. Kelleher (*pro hac vice*)  
Kara E. Cheever (*pro hac vice*)  
Victoria G. Mazzola (*pro hac vice*)  
1650 Market St., Ste. 2800  
Philadelphia, PA 19103  
[jkelleher@cozen.com](mailto:jkelleher@cozen.com)  
[kcheever@cozen.com](mailto:kcheever@cozen.com)  
[vmazzola@cozen.com](mailto:vmazzola@cozen.com)

*Attorneys for Plaintiff,  
Ameritas Life Insurance Corp.*

Dated: April 29, 2025

**ORRICK, HERRINGTON &  
SUTCLIFFE LLP**

Khai LeQuang (*pro hac vice*)  
Aaron M. Rubin (*pro hac vice*)  
Richard W. Krebs (*pro hac vice*)  
2050 Main Street, Suite 1100  
Irvine, CA 92614-8255  
949-567-6700  
[klequang@orrick.com](mailto:klequang@orrick.com)  
[amrubin@orrick.com](mailto:amrubin@orrick.com)  
[rkrebs@orrick.com](mailto:rkrebs@orrick.com)

*Attorneys for Defendant Wilmington  
Savings Fund Society, FSB, solely as  
Securities Intermediary*

**SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2025.

---

Honorable Gregory B. Williams, U.S.D.J.